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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,	)	No. 3:22-cr-00084-SI
	)	
Plaintiff,	)	DEFENDANT'S EXHIBIT LIST
	)	
vs.	)	
	)	
TONY KLEIN	)	
	)	
Defendant.	)	

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Defendant Tony Klein, by counsel, identifies the following exhibits in advance of trial. This list identifies Mr. Klein's anticipated exhibits for use in the direct examination of witnesses. Therefore, this list does not include, generally, all exhibits related to the cross examination of potential government witnesses. Mr. Klein reserves the right to amend this list and to designate additional exhibits as appropriate. Mr. Klein also reserves the right

to use exhibits identified by the Government. Further, Mr. Klein reserves the right to amend this list to include additional exhibits for impeachment.

Lastly, certain documents are excluded from this list; namely, expert report(s), demonstrative exhibits, prior witness statements, and summary exhibits to be admitted under Evidence Rule 1006.

Mr. Klein anticipates that the parties will meet and confer about the presentation and admission of trial exhibits prior to the deadline for motions in limine. Below, the numbers listed in the first column are not exhibit numbers for trial and are intended to serve only as pretrial numerical designations (“PTND”) for the parties’ reference during pretrial proceedings.

<b>PTND</b>	<b>Description</b>
1001	Photograph of Coffee Creek Correctional Facility (hereinafter “CCCF”) medium security facility entry hall "guard station" to the right
1002	Photograph of CCCF medium security facility hall and door into nursing station/clinic
1003	Photograph of CCCF medium security facility exam room S125 from hall
1004	Photograph of CCCF medium security facility inside of room S125 looking out
1005	Photograph of CCCF medium security facility hallway extending right from nurse's station
1006	Photograph of CCCF medium security facility exterior of room S133, Soiled
1007	Photograph of CCCF medium security facility interior of room S133
1008	Photograph of CCCF medium security facility exterior of room S133

1009	Photograph of CCCF medium security facility exterior of S134, Dental Operatory, and S140, Trauma
1010	Photograph of CCCF medium security facility interior of dental clinic
1011	Photograph of CCCF medium security facility interior of rooms dental clinic
1012	Photograph of CCCF medium security facility interior of rooms dental clinic
1013	Photograph of CCCF medium security facility interior of rooms dental clinic
1014	Photograph of CCCF medium security facility dialysis room
1015	Photograph of CCCF medium security facility exterior of S149, Janitor
1016	Photograph of CCCF medium security facility exterior of S149 with concave mirror
1017	Photograph of CCCF medium security facility room S145, Radiology
1018	Photograph of CCCF medium security facility interior of S145 including interior rooms
1019	Photograph of CCCF medium security facility interior of S145
1020	Photograph of CCCF medium security facility hallway standing outside of S145
1021	Photograph of CCCF medium security facility exterior of S144, Special Procedures
1022	Photograph of CCCF medium security facility interior of S144, Special Procedures
1023	Photograph of CCCF medium security facility infirmary hallway
1024	Photograph of CCCF medium security facility infirmary hallway
1025	Photograph of CCCF medium security facility infirmary hallway
1026	Photograph of CCCF medium security facility exterior of S199, Clean
1027	Photograph of CCCF medium security facility infirmary hallway
1028	Photograph of CCCF medium security facility provider rooms and hall

1029	Photograph of CCCF medium security facility hallway into C/D housing units
1030	Photograph of CCCF medium security facility kytes mailboxes in C/D housing units hallway
1031	Photograph of CCCF medium security facility kytes mailboxes in C/D housing units hallway
1032	Photograph of CCCF medium security facility exterior of C/D housing units triage
1033	Photograph of CCCF medium security facility interior of C/D housing units triage
1034	Photograph of CCCF medium security facility interior of C/D housing units triage
1035	Photograph of CCCF medium security facility hallway from outside C/D housing units triage
1036	Photograph of CCCF medium security facility C/D housing units triage room door from inside of triage room
1037	Photograph of CCCF medium security facility C/D housing units triage room door detail from inside of triage room
1038	Photograph of CCCF medium security facility mirror above CD09, Interview
1039	Photograph of CCCF medium security facility C/D housing units hallway from Correctional Officer station
1040	Photograph of CCCF medium security facility E/F segregated housing units triage room EF23, Interview
1041	Photograph of CCCF medium security facility E/F segregated housing units triage room EF23
1042	Photograph of CCCF medium security facility interior of E/F segregated housing units triage room EF23
1043	Photograph of CCCF medium security facility E/F segregated housing units triage room EF23 from the inside of the room looking out
1044	Photograph of CCCF medium security facility interior of E/F segregated housing units triage room EF23
1045	Photograph of CCCF medium security facility interior of room EF24 showing windows
1046	Photograph of CCCF medium security facility interior of room EF24 showing windows
1047	Photograph of CCCF medium security facility entry hall to E/F segregated housing units

1048	Photograph of CCCF medium security facility G/H housing unit triage room GH04, Exam
1049	Photograph of CCCF medium security facility G/H housing unit triage room GH04 from the interior looking out
1050	Photograph of CCCF medium security facility G/H housing unit shared hallway
1051	Photograph of CCCF medium security facility G/H housing unit kyte mailboxes
1052	Photograph of CCCF medium security facility G/H housing unit hallway bench
1053	Photograph of CCCF medium security facility J/K housing unit shared hallway
1054	Photograph of CCCF medium security facility J/K housing unit triage room JK04, Exam
1055	Photograph of CCCF medium security facility J/K housing unit hallway showing kyte mailboxes
1056	Photograph of CCCF medium security facility J/K housing unit hallway bench
1057	Photograph of CCCF minimum security facility hallway with medication line window to the right
1058	Photograph of CCCF minimum security facility hallway medication line window
1059	Photograph of CCCF minimum security facility clinic
1060	Photograph of CCCF minimum security facility clinic provider rooms
1061	Photograph of CCCF minimum security facility cubicle and provider rooms
1062	Photograph of CCCF minimum security facility room C03, Exam Plus
1063	Photograph of CCCF minimum security facility nursing station and file room
1064	Photograph of CCCF medium security facility hallway and room opposite nurses' station
1065	Photograph of CCCF medium security facility room S131, Exam, exterior door
1066	Photograph of CCCF medium security facility room S131, Exam, exterior door
1067	Photograph of CCCF medium security facility room S132, Clean Room

1068	Photograph of CCCF medium security facility room S132, Clean Room
1069	Photograph of CCCF medium security facility C/D housing units rooms CD10, Small Group Room, and CD11, Sally Vestibule
1070	Photograph of CCCF medium security facility C/D housing units rooms CD09, Interview, and CD10, Small Group Room
1071	Photograph of CCCF medium security facility C/D housing units rooms CD09, Interview, and CD10, Small Group Room, and CD11, Sally Vestibule
1072	Photograph of CCCF medium security facility C/D housing units rooms CD13 and CD14
1073	Photograph of CCCF medium security facility C/D housing units room CD06, Nurse, room adjacent to triage and shared unit hallway
1074	Photograph of CCCF medium security facility C/D housing units room CD08, Storage, inside of CD06
1075	Photograph of CCCF medium security facility C/D housing units room CD08 interior
1076	Photograph of CCCF medium security facility C/D housing units room CD08 interior looking out
1077	Oregon Department of Corrections training materials, Legal Issues v.5.1.17
1078	Oregon Department of Corrections training materials, Mental Health and Disabilities v.7-1-14
1079	Oregon Department of Corrections training materials, Prison Rape Elimination Act - PREA v.7-1-14
1080	Oregon Department of Corrections training materials, Suicide Awareness and Intervention v.7-1-14
1081	Oregon Department of Corrections training materials, Supervision of Inmates v.7-1-14
1082	Oregon Department of Corrections training materials, Ethics and Professionalism v.5-1-17
1083	Oregon Department of Corrections training materials, Ethics and Professionalism v.7-1-14
1084	Oregon Department of Corrections training materials, F24 FTEP Manual Final 04_20_15

1085	Oregon Department of Corrections training materials, Oregon Accountability Model (OAM)
1086	2015 CCCF Nurses Schedules
1087	2016 CCCF Nurses Schedules
1088	2017 CCCF Nurses Schedules
1089	2018 CCCF Nurses Schedules
1090	Judgment in 201017523B (AV1)
1091	Judgment in 17CR17730 (AV1)
1092	Amended Judgment in 18CR04454 (AV1)
1093	Judgment in 18CR28239 (AV1)
1094	Judgment in 06C47154 (AV2)
1095	Judgment in 08C49044 (AV2)
1096	Judgment in 14CR59864 (AV2)
1097	Judgment in D150204M (AV2)
1098	Amended Judgment in 14C46183 (AV2)

Respectfully Submitted this 22<sup>nd</sup> day of March, 2023:

/s/ Matthew G. McHenry

Matthew G. McHenry  
Counsel for Tony Klein

/s/ Amanda Alvarez Thibeault

Amanda Alvarez Thibeault  
Counsel for Tony Klein